## EXHIBIT 35

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

UNITED STATES FIDELITY AND GUARANTY COMPANY,	)
Plaintiff,	)
v.	) Case No.: 1:08-cv-00862
VOA ASSOCIATES INC., LIBERTY INTERNATIONAL UNDERWRITERS, MICHAEL J. MADDEN and JEAN MADDEN,	) Judge Matthew F. Kennelly )
Defendants.	)

## **AFFIDAVIT OF MANUEL WILLIFORD**

Manuel Williford, under oath, deposes and states:

- 1. I am of sound mind and have knowledge of all matters stated herein.
- 2. I am not a Defendant in the above captioned case
- 3. On May 4, 2005, I held the position of Senior Distribution Specialist for The St. Paul Travelers Companies, Inc. ("St. Paul Travelers").
- 4. In the course of my duties at St. Paul Travelers, I was in charge of the Mailroom in the offices of St. Paul Travelers in Chicago, Illinois.
- 5. Mail was processed daily at the Mailroom and taken to a designated area for pickup by the United States Post Office.
  - 6. At the offices of St. Paul Travelers, there was a mail bin labeled "Outgoing Mail."
- 7. Mail placed in the "Outgoing Mail" bin was processed by shooting it through the feeder of the postage machine, which sealed and stamped the envelope.

- 8. The stamped mail was then taken to the first floor of the building, where it was held for pickup by the United States Postal Service.
- 9. In accordance with the policies and procedures existing at St. Paul Travelers, all mail placed in the "Outgoing Mail" bin on May 4, 2005, including the reservation of rights letter sent to VOA Associates by Iris Robinson, was processed and placed in the designated area for pickup by the United States Post Office.

FURTHER AFFIANT SAITH NOT.

OFFICIAL SEAL
ELIZABETH M THIESING
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES 05/22/22

Subscribed and Sworn to Before Me

on this the  $8^{1/2}$  day of  $\ell$ 

Notary Public

2009.